

LAW OFFICE OF MARK MAZDA
MARK MAZDA, SB# 181419
2601 Main Street, Suite 1200
Irvine, California 92614
telephone (949) 222-9182
facsimile (949) 222-9199
email: mark@markmazda.com

Attorney for Defendants
Sophia Lawson Clark, in her capacity as Administrator
of the Estate of Scott Lawson, and Lopez To Lawson, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SOPHIA LAWSON CLARK, in her
capacity as Administrator of the Estate
of Scott Lawson, and LOPEZ TO
LAWSON, INC.,

Defendants.

CASE NO. 2:23-cv-2945

**DEFENDANTS SOPHIA LAWSON
CLARK'S AND LOPEZ TO LAWSON,
INC.'S ANSWER TO PLAINTIFF'S
COMPLAINT**

DEMAND FOR JURY TRIAL

Defendants Sophia Lawson Clark ("Clark"), in her capacity as Administrator of the Estate of Scott Lawson, and Lopez to Lawson, Inc. ("LTL") (collectively, "Defendants") hereby answer Plaintiff's complaint as follows:

1. Defendants lack information sufficient to admit or deny the allegations in paragraph 1 of the complaint and on that basis deny all of those allegations.
2. Defendants lack information sufficient to admit or deny the allegations in paragraph 2 of the complaint and on that basis deny all of those allegations.
3. Defendants lack information sufficient to admit or deny the allegations in paragraph 3 of the complaint and on that basis deny all of those allegations.
4. Defendants lack information sufficient to admit or deny the allegations in paragraph

Defendants' Answer

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4 of the complaint and on that basis deny all of those allegations.

5. Defendants admit all of the allegations in paragraph 5, except for the allegations that “A portion of the Park is located on the Allotment. Allotments of Indian tribal land are governed by federal law” and as to those allegations, Defendants lack information sufficient to admit or deny those allegations and on that basis deny those allegations.

6. Defendants lack information sufficient to admit or deny the allegations in paragraph 6 of the complaint and on that basis deny all of those allegations.

7. Defendants lack information sufficient to admit or deny the allegations in paragraph 7 of the complaint and on that basis deny all of those allegations.

8. Defendants admit the allegations in paragraph 8 of the complaint.

9. Defendants lack information sufficient to admit or deny the allegations in paragraph 9 of the complaint and on that basis deny all of those allegations.

10. Defendants deny the allegations of paragraph 10 of the complaint.

11. Defendants admit the allegations of paragraph 11 of the complaint.

12. Defendants deny the allegation in paragraph 12 of the complaint that “The Superior Court of California for the County of Riverside created the Estate of Scott Lawson on or about November 15, 2021.” Defendants admit the other allegations of paragraph 12 of the complaint.

13. Defendants lack information sufficient to admit or deny the allegations in paragraph 13 of the complaint and on that basis deny all of those allegations.

14. Defendants admit that LTL was created after the death of Scott Lawson. Defendants deny the rest of the allegations of paragraph 14 of the complaint.

15. Defendants admit the allegations in paragraph 15 of the complaint.

16. Defendants lack information sufficient to admit or deny the allegations in paragraph 16 of the complaint and on that basis deny all of those allegations.

17. Defendants lack information sufficient to admit or deny the allegations in paragraph 17 of the complaint and on that basis deny all of those allegations.

18. Defendants lack information sufficient to admit or deny the allegations in paragraph 18 of the complaint and on that basis deny all of those allegations.

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1 19. Defendants lack information sufficient to admit or deny the allegations in paragraph
2 19 of the complaint and on that basis deny all of those allegations.

3 20. Defendants lack information sufficient to admit or deny the allegations in paragraph
4 20 of the complaint and on that basis deny all of those allegations.

5 21. Defendants lack information sufficient to admit or deny the allegations in paragraph
6 21 of the complaint and on that basis deny all of those allegations.

7 22. Defendants lack information sufficient to admit or deny the allegations in paragraph
8 22 of the complaint and on that basis deny all of those allegations.

9 23. Defendants lack information sufficient to admit or deny the allegations in paragraph
10 23 of the complaint and on that basis deny all of those allegations.

11 24. Defendants lack information sufficient to admit or deny the allegations in paragraph
12 24 of the complaint and on that basis deny all of those allegations.

13 25. Defendants lack information sufficient to admit or deny the allegations in paragraph
14 25 of the complaint and on that basis deny all of those allegations.

15 26. Defendants lack information sufficient to admit or deny the allegations in paragraph
16 26 of the complaint and on that basis deny all of those allegations.

17 27. Defendants lack information sufficient to admit or deny the allegations in paragraph
18 27 of the complaint and on that basis deny all of those allegations.

19 28. Defendants lack information sufficient to admit or deny the allegations in paragraph
20 28 of the complaint and on that basis deny all of those allegations.

21 29. Defendants lack information sufficient to admit or deny the allegations in paragraph
22 29 of the complaint and on that basis deny all of those allegations.

23 30. Defendants lack information sufficient to admit or deny the allegations in paragraph
24 30 of the complaint and on that basis deny all of those allegations.

25 31. Defendants lack information sufficient to admit or deny the allegations in paragraph
26 31 of the complaint and on that basis deny all of those allegations.

27 32. Defendants lack information sufficient to admit or deny the allegations in paragraph
28 32 of the complaint and on that basis deny all of those allegations.

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1 33. Defendants lack information sufficient to admit or deny the allegations in paragraph
2 33 of the complaint and on that basis deny all of those allegations.

3 34. Defendants lack information sufficient to admit or deny the allegations in paragraph
4 34 of the complaint and on that basis deny all of those allegations.

5 35. Defendants lack information sufficient to admit or deny the allegations in paragraph
6 35 of the complaint and on that basis deny all of those allegations.

7 36. Defendants deny the allegations in paragraph 36 of the complaint.

8 37. Defendants deny the allegations in paragraph 37 of the complaint.

9 38. Defendants deny the allegations in paragraph 38 of the complaint.

10 39. Defendants deny the allegations in paragraph 39 of the complaint.

11 40. Defendants deny the allegations in paragraph 40 of the complaint.

12 41. Defendants lack information sufficient to admit or deny the allegations in paragraph
13 41 of the complaint and on that basis deny all of those allegations.

14 42. Defendants deny the allegations in paragraph 42 of the complaint.

15 43. Defendants deny the allegations in paragraph 43 of the complaint.

16 44. Defendants deny the allegations in paragraph 44 of the complaint.

17 45. Defendants lack information sufficient to admit or deny the allegations in paragraph
18 45 of the complaint and on that basis deny all of those allegations.

19 46. Defendants deny the allegations in paragraph 46 of the complaint.

20 47. Defendants lack information sufficient to admit or deny the allegations in paragraph
21 47 of the complaint and on that basis deny all of those allegations.

22 48. Defendants lack information sufficient to admit or deny the allegations in paragraph
23 48 of the complaint and on that basis deny all of those allegations.

24 49. Defendants lack information sufficient to admit or deny the allegations in paragraph
25 49 of the complaint and on that basis deny all of those allegations.

26 50. Defendants deny the allegations in paragraph 50 of the complaint.

27 51. Defendants lack information sufficient to admit or deny the allegations in paragraph
28 51 of the complaint and on that basis deny all of those allegations.

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1 52. Defendants lack information sufficient to admit or deny the allegations in paragraph
2 52 of the complaint and on that basis deny all of those allegations.

3 53. Defendants lack information sufficient to admit or deny the allegations in paragraph
4 53 of the complaint and on that basis deny all of those allegations.

5 54. Defendants lack information sufficient to admit or deny the allegations in paragraph
6 54 of the complaint and on that basis deny all of those allegations.

7 55. Defendants lack information sufficient to admit or deny the allegations in paragraph
8 55 of the complaint and on that basis deny all of those allegations.

9 56. Defendants lack information sufficient to admit or deny the allegations in paragraph
10 56 of the complaint and on that basis deny all of those allegations.

11 57. Defendants lack information sufficient to admit or deny the allegations in paragraph
12 57 of the complaint and on that basis deny all of those allegations.

13 58. Defendants lack information sufficient to admit or deny the allegations in paragraph
14 58 of the complaint and on that basis deny all of those allegations.

15 59. Defendants lack information sufficient to admit or deny the allegations in paragraph
16 59 of the complaint and on that basis deny all of those allegations.

17 60. Defendants lack information sufficient to admit or deny the allegations in paragraph
18 60 of the complaint and on that basis deny all of those allegations.

19 61. Defendants lack information sufficient to admit or deny the allegations in paragraph
20 61 of the complaint and on that basis deny all of those allegations.

21 62. Defendants lack information sufficient to admit or deny the allegations in paragraph
22 62 of the complaint and on that basis deny all of those allegations.

23 63. Defendants lack information sufficient to admit or deny the allegations in paragraph
24 63 of the complaint and on that basis deny all of those allegations.

25 64. Defendants lack information sufficient to admit or deny the allegations in paragraph
26 64 of the complaint and on that basis deny all of those allegations.

27 65. Defendants lack information sufficient to admit or deny the allegations in paragraph
28 65 of the complaint and on that basis deny all of those allegations.

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1 66. Defendants lack information sufficient to admit or deny the allegations in paragraph
2 66 of the complaint and on that basis deny all of those allegations.

3 67. Defendants lack information sufficient to admit or deny the allegations in paragraph
4 67 of the complaint and on that basis deny all of those allegations.

5 68. Defendants lack information sufficient to admit or deny the allegations in paragraph
6 68 of the complaint and on that basis deny all of those allegations.

7 69. Defendants lack information sufficient to admit or deny the allegations in paragraph
8 69 of the complaint and on that basis deny all of those allegations.

9 70. Defendants lack information sufficient to admit or deny the allegations in paragraph
10 70 of the complaint and on that basis deny all of those allegations.

11 71. Defendants deny each and every allegation of this paragraph, including all its
12 subparagraphs a. through g.

13 72. Defendants deny all the allegations in paragraph 72 of the complaint.

14 73. Defendants deny all the allegations in paragraph 73 of the complaint.

15 74. Defendants lack information sufficient to admit or deny the allegations in paragraph
16 74 of the complaint and on that basis deny all of those allegations.

17 75. Defendants lack information sufficient to admit or deny the allegations in paragraph
18 75 of the complaint and on that basis deny all of those allegations.

19 76. Defendants deny each and every allegation of this paragraph, including all its
20 subparagraphs a. through i.

21 77. Defendants lack information sufficient to admit or deny the allegations in paragraph
22 75 of the complaint that “EPA conducted a follow-up walk-through at the Park on December 14,
23 2021” and on that basis deny all of those allegations. Defendants deny the remaining allegations
24 in paragraph 75 of the complaint.

25 78. Defendants lack information sufficient to admit or deny the allegations in paragraph
26 78 of the complaint and on that basis deny all of those allegations.

27 79. Defendants deny each and every allegation of this paragraph, including all its
28 subparagraphs a. through j.

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1 80. Defendants lack information sufficient to admit or deny the allegations in paragraph
2 80 of the complaint that “EPA visited the Park in May 2023” and on that basis deny all of those
3 allegations. Defendants deny the remaining allegations in paragraph 80 of the complaint.

4 81. Defendants deny all the allegations in paragraph 81 of the complaint.

5 82. Defendants incorporate their responses to paragraphs 1 through 81 of the complaint
6 above as if fully set forth here.

7 83. Defendants lack information sufficient to admit or deny the allegations in paragraph
8 83 of the complaint and on that basis deny all of those allegations.

9 84. Defendants deny the allegations in paragraph 84 of the complaint.

10 85. Defendants deny the allegations in paragraph 85 of the complaint.

11 86. Defendants deny the allegations in paragraph 86 of the complaint.

12 87. Defendants incorporate their responses to paragraphs 1 through 81 of the complaint
13 above as if fully set forth here.

14 88. Defendants lack information sufficient to admit or deny the allegations in paragraph
15 88 of the complaint and on that basis deny all of those allegations.

16 89. Defendants deny the allegations in paragraph 89 of the complaint.

17 90. Defendants deny the allegations in paragraph 90 of the complaint.

18 91. Defendants deny the allegations in paragraph 91 of the complaint.

19 92. Defendants incorporate their responses to paragraphs 1 through 91 of the complaint
20 above as if fully set forth here.

21 93. Defendants deny the allegations in paragraph 93 of the complaint.

22 94. Defendants deny the allegations in paragraph 93 of the complaint.

23 95. Defendants incorporate their responses to paragraphs 1 through 81 of the complaint
24 above as if fully set forth here.

25 96. Defendants deny the allegations in paragraph 96 of the complaint.

26 97. Defendants deny the allegations in paragraph 97 of the complaint.

27 Defendants respond to Plaintiff’s prayer for relief as follows:

28 1. Defendants deny that the Court should issue an injunction sought in the complaint’s

1 prayer for relief under number 1; and further deny that there is an imminent or substantial
2 endangerment at the Park with respect to the System or the wastewater system;

3 2. Defendants deny that the Court should issue the requested injunction sought in the
4 complaint's prayer for relief under number 2;

5 3. Defendants deny that the Court should enter any money judgment; and

6 4. Defendants deny that the Court should award Plaintiff any costs.

7 **AFFIRMATIVE DEFENSES**

8 In addition, Defendants assert the following affirmative defenses:

9 1. The complaint and each cause of action therein fail to state facts sufficient to
10 constitute causes of action.

11 2. The complaint, and each cause of action therein are barred because, by its conduct or
12 otherwise, Plaintiff is estopped from asserting such claims.

13 3. The complaint, and each and every purported cause of action therein are barred in
14 whole or in part by the doctrine of unclean hands.

15 4. Plaintiff's course of conduct constitutes a waiver of the claims in complaint, and each
16 cause of action contained therein.

17 5. Plaintiff is barred from recovering on each and every purported cause of action in the
18 complaint on the grounds of fraud and/or mistake.

19 6. Plaintiff's claims are barred by the doctrine of laches.

20 7. Defendants have not yet completed discovery of the facts and circumstances allegedly
21 giving rise to this litigation, and accordingly, reserve the right to amend, modify, revise, or
22 supplement this answer to the complaint in order to plead such additional or different defenses.

23 **PRAYER FOR RELIEF**

24 Wherefore, Defendants pray for the following relief:

25 1. That Plaintiff take nothing by its complaint,

26 2. For costs and expenses of suit incurred herein;

27 3. For attorneys' fees; and
28

1 4. For such other and further relief as the Court may deem just and proper.

2 **DEMAND FOR JURY TRIAL**

3 Defendants hereby demand a trial by jury on all claims and issues to which they may be
4 entitled to a jury trial.

5
6 Dated: November 16, 2023

LAW OFFICE OF MARK MAZDA

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10 By: _____
11 Mark Mazda

12 Attorney for Defendants
13 Sophia Lawson Clark, in her capacity as
14 Administrator of the Estate of Scott Lawson, and
15 Lopez To Lawson, Inc.
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